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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Oregon Fish and Wildlife Office
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Portland, Oregon 97266
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Reply To: 7313.1031
File Name: PN01-689, Will. Riv. Maint. Dredg., RM 1
OALS: 01-4168

August 20, 2001

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To	From
Pat Quinn	Judy Linton
Dept./Agency	Phone #
Fax # 240-2009	Fax #

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

Colonel Randall J. Butler, District Engineer
Portland District, Corps of Engineers
ATTN: CENWP-GP-OP (Linton)
P. O. Box 2946
Portland, Oregon 97208-2946

Re: PN 01-689
Port of Portland
Willamette River-Maint. Dredging
Multnomah County, Oregon
July 20, 2001

Dear Colonel Butler:

The Fish and Wildlife Service has reviewed the referenced public notice regarding a proposal to conduct maintenance dredging at Terminal 5 in the Willamette River at River Mile (RM) 1.0, Multnomah County, Oregon. These comments have been prepared under the authority of and in accordance with the provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) and are consistent with the intent of the National Environmental Policy Act of 1969. This letter does not fulfill the requirements of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.). If the Corps of Engineers (Corps) determines, based on a Biological Assessment or evaluation, that threatened and endangered species and/or critical habitat may be affected by the project, the Corps is required to consult with the Service following the requirements of 50 CFR 402 which implement the Act.

PROJECT DESCRIPTION

The proposed project would involve dredging with a clamshell dredge to a depth of -15 and -40 feet (plus 2 feet of overdraft) at Berth 501; -35 feet at Berth 502 with 2 feet of overdraft; and to -40 feet with 2 feet of overdraft at Berth 503. The annual amount of material to be removed is estimated at up to 8,000 cubic yards (cy). The dredged material would be offloaded at the Port's Suttle Road Dredged Material Rehandle Facility and would be subsequently used as fill or

disposed of at offsite locations. Use of the rehandle site would involve dewatering of the sediments with return flow to the Columbia River. Sediment testing of the proposed dredging sites is underway.

FISH AND WILDLIFE RESOURCES

The Willamette River at the project site is used by several species of anadromous fishes for rearing, feeding, and migration. These include spring and fall chinook and coho salmon; winter and summer steelhead and scarun cutthroat trout; Pacific lamprey; shad; and sturgeon. Resident game fish such as rainbow and resident cutthroat trout; whitefish; and smallmouth and largemouth bass as well as a variety of nongame fish also use the Willamette River for spawning, rearing, and feeding.

Several of the above anadromous fish species have been listed under the Endangered Species Act as follows: Snake River sockeye salmon (endangered); Snake River spring/summer chinook salmon (threatened); Snake River fall chinook salmon (threatened); Snake River steelhead trout (threatened); Columbia River chum salmon (threatened); Lower Columbia River steelhead trout (threatened); Lower Columbia River chinook salmon (threatened); Middle Columbia River steelhead trout (threatened); Upper Columbia River steelhead trout (endangered); Upper Columbia River spring chinook salmon (endangered); Upper Willamette River chinook salmon (threatened); Upper Willamette River steelhead trout (threatened); and SW Washington/ Columbia River coastal cutthroat trout (proposed threatened).

Aquatic wildlife resources associated with the proposed project area include waterfowl species like mallard and Canada goose and aquatic furbearers such as mink and river otter. Hawks, peregrine falcons, pigeons, opossums, raccoons, squirrels, and a variety of small mammals also are found in the project area. Bald eagles and ospreys are present in the vicinity of the project and ospreys may occasionally forage in this portion of the Willamette River.

FISH AND WILDLIFE SERVICE CONCERNS

The Service has concerns regarding the composition (grain size) and contaminant content of the sediments that are proposed for dredging, and the lack of a monitoring plan. Each of these concerns is discussed below.

Previous testing over the years at Terminal 5 (berths 501-503) by Hart Crowser for the Port of Portland revealed sediments contaminated with total DDTs, tributyltin, and total PAHs at concentrations that are of concern to the Service. Dredging in these sediments could resuspend these materials into the water column, thus exposing fish and other aquatic organisms to contamination. In particular, the Service is concerned that cutthroat trout and other salmonids could be exposed to contaminants resuspended during the dredging activity. The Corps document entitled "Dredged Material Evaluation Framework, Lower Columbia River Management Area" requires testing of material proposed for dredging under a Tiered Evaluation Process. It is important that up-to-date information is available on the grain size, total volatile solids (TVS), and chemical concentrations of the sediments to be dredged in order to compare

current contaminant concentrations to those previously reported, and to evaluate the potential effects of these contaminants on fish and wildlife resources in the project area.

The Service believes monitoring of the proposed dredging also is necessary. A monitoring plan should be developed by the applicant to determine project impacts in terms of water quality effects (turbidity, DO, pH), fish kills, and/or effects on benthic organisms (productivity, density, recovery, etc.). This information would be useful for developing permit renewal conditions that would protect fish and wildlife resources in the project area in the future. In addition, we recommend that silt curtains or other best management practices (BMPs) be employed during the dredging activity to reduce resuspension and availability of contaminants.

In reviewing the location of your project and the information included in the public notice, we believe there may be effects on listed species. We request a copy of your biological assessment or other documentation regarding your analysis of effects of the proposed project on listed species. This analysis should address direct and indirect effects of the proposed project, including interrelated and interdependent effects of activities associated with the project.

In addition, we ask that the Corps provide this office with copies of the Record of Decision for the permit application and the issued permit. Copies of these documents will help us to maintain a complete professional record of the above cited project.

RECOMMENDATIONS

To protect and minimize adverse impacts to fish and wildlife resources of the Willamette River, the Service recommends that:

1. Sediment testing for grain size, TVS, and chemical constituents be conducted and that the results of this testing be provided to this office for review and comment prior to initiation of dredging.

2. A monitoring plan be developed to assess immediate and long-term dredging impacts on water quality, fish, and benthic organisms.

3. An evaluation be conducted regarding the deployment of silt screens and other BMPs in the project area to reduce resuspension and availability of contaminants during dredging.

Please contact Kathi Larson or Jeremy Buck at this office (503-231-6179) if you have any questions regarding these comments or need additional information.

The above views and recommendations constitute the report of the Department of the Interior on the subject public notice.

Sincerely yours,

for Kemper M. McMaster
State Supervisor
Acting for U.S. Department of
the Interior Coordinator

KL, JB/kl/01-689

cc:
EPA
NMFS
OFWO, End. Sp., White
ODFW
DSL
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